

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - REVISED

PERMITTEE

Packaging Products Corporation  
Attn: Leonard Brooker  
999 Lee Street  
Elk Grove Village, Illinois 60007

<u>Application No.:</u> 96070051	<u>I.D. No.:</u> 031440ALA
<u>Applicant's Designation:</u>	<u>Date Received:</u> March 7, 2001
<u>Subject:</u> Flexographic Printing	
<u>Date Issued:</u> June 7, 2001	<u>Expiration Date:</u> April 15, 2003
<u>Location:</u> 999 Lee Street, Elk Grove Village	

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of one flexographic printing press and one extruder/laminator pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., volatile organic material to less than 25 tons per year, hazardous air pollutants less than 10 and 25 tons per year). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
2. Emissions and operation of the extruder/laminator and the flexographic printing press shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
Extruder/Laminator Cleanup	834	5.0	834	5.0
Press Ink and Cleanup	834	5.0	834	5.0

These limits are based on the maximum material usage and the maximum VOM content. Compliance with the annual limits shall be determined from a running total of 12 months of data.

- 3a. The weighted average, by volume, VOM content of all coatings and inks as applied each day on the flexographic printing line shall not exceed twenty-five percent, as determined by 35 Ill. Adm. Code 218.401(b)(2).

- b. The VOM content as applied shall be demonstrated through the applicable coating or ink analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a).
- c. The Permittee shall maintain the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.404(d).
- 4. This permit is issued based on negligible emissions of particulate matter from the extruder/laminator. For this purpose emissions of each contaminant shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.
- 5. This permit contains the federally enforceable conditions from Construction Permit(s) 01030020. These conditions effectively limit the potential emissions of air pollutants from the source to less than major source thresholds (i.e., VOM to less than 25 tons per year and HAPs to less than 10 and 25 tons per year, etc.). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit.
- 6. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- 7a. The Permittee shall maintain records of the following items, and such other items as may be appropriate to allow the Illinois EPA to review compliance with the limits in this permit.
  - i. The Permittee shall collect and record all of the following information each day for each printing line and maintain the information at the source for a period of three years:
    - A. The name and identification number of each coating and ink as applied on each printing line;
    - B. The VOM content and the volume of each coating and ink as applied each day on each printing line;
    - C. The daily-weighted average VOM content of all coatings and inks as applied on each printing line; and
    - D. VOM emissions (tons/month and tons/year).
  - ii. The Permittee shall notify the Illinois EPA in the following instances:

- A. Any record showing violation of 35 Ill. Adm. Code 218.401(b) shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurrence of the violation; and
  - B. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218.401 from 35 Ill. Adm. Code 218.401(b) to 35 Ill. Adm. Code 218.401(a) or 218.401(c), the Permittee shall comply with all requirements of subsection 35 Ill. Adm. Code 218.404(c)(1) or (e)(1), respectively. Upon changing the method of compliance with 35 Ill. Adm. Code 218.401(a) or (c), the Permittee shall comply with all requirements of 35 Ill. Adm. Code 218.404(c) or (e), respectively.
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
8. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

10. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
  - a. The name and identification number of each coating and ink as applied on each printing line;
  - b. The VOM content and the volume of each coating and ink as applied each day on each printing line;
  - c. The daily-weighted average VOM content of all coatings and inks as applied on each printing line; and
  - d. VOM emissions (tons/month and tons/year).

Please noted that the fuel combustion equipment is exempt from state permit requirements, pursuant to 35 Ill. Adm. Code 201.146(d) and (fff), respectively.

It should be noted that this permit has been revised to incorporate Construction Permit 01030020 and to remove one flexographic press.

If you have any questions on this, please call John Blazis at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 1  
Illinois EPA, Compliance Section  
USEPA

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from flexographic printing plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of volatile organic material at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled, less ink is used or a lower VOM content material is used and control measures are more effective than required in this permit.

1. Emissions and operation of the extruder/laminator and the flexographic printing press:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Lb/Mo)</u>	<u>(Ton/Yr)</u>
Extruder/Laminator Cleanup	834	5.0	834	5.0
Press Ink and Cleanup	834	5.0	834	5.0

2. This permit is issued based on negligible emissions of particulate matter from the extruder/laminator. For this purpose emissions of each contaminant shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/yr.

3. Emissions and operation of all fuel combustion equipment:

<u>Fuel Usage</u>		<u>Emission</u>	<u>VOM Emissions</u>	
<u>(mmscf/Mo)</u>	<u>(mmscf/Yr)</u>	<u>Factor</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
3.0	36.0	5.5	0.01	0.10

4. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.

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